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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No.: 3:20-cr-00205-IM

Plaintiff,

DECLARATION OF JAMIE S. KILBERG
(re: Unopposed Motion To Continue Trial)

v.

TAIMANE JAME TEO,

Defendant.

I, Jamie S. Kilberg, declare that the following statements are true to the best of my knowledge, information and belief:

1. I am counsel for defendant Taimane Jame Teo.
2. I make this declaration in support of our motion to continue the trial, currently scheduled for March 9, 2021, for approximately 60 days, until on or after May 9, 2021, or a date thereafter convenient for the Court.

3. Mr. Teo made his initial appearance and arraignment in this matter on July 6, 2020. He was released on conditions and has remained on release since that time. This is Mr. Teo's fourth request for a continuance.

4. Mr. Teo was charged with one count of misdemeanor assault on a federal officer, in violation of 18 U.S.C. § 111(a)(1). Mr. Teo's charge stems from his alleged involvement in protests outside of the federal courthouse in Portland on the evening of July 5-6, 2020.

5. Since Mr. Teo's arraignment, we have received limited discovery from the government. On August 24, 2020, Assistant United States Attorney Chris Cardani advised me by email that the government is continuing to collect discoverable material but that it was not yet available to be produced. On October 19, 2020, Mr. Cardani further advised that he would inquire whether the government has video of the event in question and Mr. Teo's arrest. On February 17, 2021, the parties met to discuss potential resolution to the matter.

6. Given the need for the parties to continue discussions surrounding resolving this case, we need additional time. Mr. Teo therefore respectfully requests that this Court continue his trial date for approximately 60 days, until on or after May 9, 2021.

7. I have discussed with Mr. Teo his rights under the Speedy Trial Act. Mr. Teo has told me that he understands the need for adequate preparation. He therefore consented to the requested delay of his trial.

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8. On March 2, 2021, Assistant United States Attorney Chris Cardani advised via email that he would be unable to have a final decision on potential resolution of his case before the current trial date, and that he therefore does not oppose this request.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 4th day of March 2021.

s/ Jamie S. Kilberg
JAMIE S. KILBERG